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December 8, 2021

Via ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Google LLC v. Starovikov et al.*, Case No. 21-cv-10260-DLC

Dear Judge Cote:

I write on behalf of Plaintiff Google LLC (“Google”) in the above-referenced matter. On December 6, 2021, the Court granted Google’s motion to unseal the docket and add Plaintiff Google LLC and Defendants Dmitry Starovikov, Alexander Filippov, and Does 1-15 to the caption as parties. Pursuant to Section 8 of the Court’s Individual Rules of Practice in Civil Cases, and further to my December 7, 2021 letter to the court, Google respectfully requests that the Court issue an order sealing the Declaration of Shane Huntley (the “Huntley Declaration”), filed by Google in support of its December 2, 2021 Motion for a Temporary Restraining Order and Order to Show Cause Regarding a Preliminary Injunction.

The Huntley Declaration references victim email addresses in paragraphs 55(a)–(c) and 61(a)–(c) that Defendants have used in connection with certain criminal schemes, as set forth in paragraphs 45–61. Google seeks to seal the Huntley Declaration to redact the email addresses in order to protect those users’ privacy interests. *See Royal Park Invs. SA/NV v. Deutsche Bank Nat’l Tr. Co.*, 2018 WL 1750595, at *21 (S.D.N.Y. Apr. 11, 2018) (holding that information disclosing “non-parties’ confidential information . . . [was] sufficiently sensitive to merit protection”). Along with this motion, Google is filing a redacted version of the declaration that removes those email addresses.

Google’s limited proposed redactions, amounting to just a handful of words, are “narrowly tailored to protect only this sensitive [personal] information.” *Kewazinga Corp. v. Microsoft Corp.*, 2021 WL 1222122, at *6 (S.D.N.Y. Mar. 31, 2021). As a result, the proposed redactions offer meaningful protection to the privacy interests of third parties yet do not unduly infringe on the Court’s interest in public access to information. *See Burgess v. Town of Wallingford*, 2012 WL 4344194, at *11 (D. Conn. Sept. 21, 2012) (ordering the redaction of email addresses and

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explaining that there was “minimal countervailing public interest in the disclosure of such personally identifying information”).

For the foregoing reasons, we respectfully request the Court enter an order sealing the Huntley Declaration. A copy of the as-filed declaration with proposed redactions highlighted is filed contemporaneously with this motion, along with a redacted version.

Respectfully submitted,

/s/ Laura Harris

Laura Harris